

CIVIL COMPLAINT FORM TO BE USED BY A *PRO SE* PRISONER

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JAMIE LAWRENCE WILLIAMS QJ0995

Full Name of Plaintiff

Inmate Number

v.

UNITED STATES

Name of Defendant 1

STATE OF PENNSYLVANIA

Name of Defendant 2

P.A.D.O.C. - L.R. HARRY,  
SECRETARY OF CORRECTIONS

Name of Defendant 3

SCI-HUNTINGDON - FACILITY MANAGER  
J. RIVELLO

Name of Defendant 4

SCI-HUNTINGDON - EMPLOYMENT DEPT.  
MS. HICKS

Name of Defendant 5 \* Attach additional page

(Print the names of all defendants. If the names of all  
defendants do not fit in this space, you may attach  
additional pages. Do not include addresses in this  
section).

Civil No.

(to be filled in by the Clerk's Office)

☒ Demand for Jury Trial

☐ No Jury Trial Demand

FILED  
SCRANTON

MAY 20 2024

PER slw  
DEPUTY CLERK

I. NATURE OF COMPLAINT

Indicate below the federal legal basis for your claim, if known.



Civil Rights Action under 42 U.S.C. § 1983 (state, county, or municipal defendants)



Civil Rights Action under Bivens v. Six Unknown Federal Narcotics Agents, 403 U.S. 388 (1971) (federal defendants)



Negligence Action under the Federal Tort Claims Act (FTCA), 28 U.S.C. § 1346, against the United States

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IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JAMIEL LAWRENCE WILLIAMS QJ0995

Full Name of Plaintiff

Inmate Number

v.

Civil No. \_\_\_\_\_

(to be filled in by the Clerk's Office)

EASTERN UNIVERSITY

Name of Defendant 1

☒ Demand for Jury Trial

☐ No Jury Trial Demand

UNIVERSITY OF SCRANTON

Name of Defendant 2

VILLANOVA UNIVERSITY

Name of Defendant 3

LEHIGH CARBON COMMUNITY COLLEGE

Name of Defendant 4

BLOOMSBURG UNIVERSITY

Name of Defendant 5 \* ATTACH ADDITIONAL PAGE

(Print the names of all defendants. If the names of all defendants do not fit in this space, you may attach additional pages. Do not include addresses in this section).

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FOR THE MIDDLE DISTRICT OF PENNSYLVANIA:

JAMIEL LAWRENCE WILLIAMS QJ0995

Full Name of Plaintiff

Inmate Number

Civil No. \_\_\_\_\_

(to be filled in by the Clerk's Office)

SCI HUNTINGDON'S - Education Dept.  
Principle Ms. Hoover

☒ Demand for Jury Trial

☐ No Jury Trial Demand

Name of Defendant 1

SCI HUNTINGDON'S - Education Dept.  
Ms. Saylor

Name of Defendant 2

SCI HUNTINGDON'S - PREA/SECURITY  
Lt. Strong

Name of Defendant 3

Name of Defendant 4

Name of Defendant 5

(Print the names of all defendants. If the names of all  
defendants do not fit in this space, you may attach  
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II. ADDRESSES AND INFORMATION

A. PLAINTIFF

WILLIAMS, JAMIEL, L.

Name (Last, First, MI)

QJ0995

Inmate Number

SCI-HUNTINGDON

Place of Confinement

1100 PIKE ST.,

Address

HUNTINGDON, PENNSYLVANIA, 16654

City, County, State, Zip Code

Indicate whether you are a prisoner or other confined person as follows:

- ☐ Pretrial detainee  
☐ Civilly committed detainee  
☐ Immigration detainee  
☒ Convicted and sentenced state prisoner  
☐ Convicted and sentenced federal prisoner

B. DEFENDANT(S)

Provide the information below for each defendant. Attach additional pages if needed.

Make sure that the defendant(s) listed below are identical to those contained in the caption. If incorrect information is provided, it could result in the delay or prevention of service of the complaint.

Defendant 1:

UNITED STATES

Name (Last, First)

PRESIDENT BIDEN

Current ~~Job Title~~

CONGRESS-MAKES LAWS

Current ~~Work Address~~

1600 PENNSYLVANIA AVE. NW

City, County, State, Zip Code

WASHINGTON D.C. 20500

Defendant 2:

STATE OF PENNSYLVANIA

Name (Last, First)

SECRETARY OF STATE

Current Job Title

508 MAIN CAPITOL BUILDING

Current Work Address

HARRISBURG, P.A. 17120

City, County, State, Zip Code

Defendant 3:

HARRY, LAUREL, R, DR.

Name (Last, First)

P.A.D.O.C., SECRETARY OF CORRECTION

Current Job Title

1920 TECHNOLOGY PARKWAY

Current Work Address

MECHANICSBURG, P.A. 17050

City, County, State, Zip Code

Defendant 4:

RIVELLO J

Name (Last, First)

FACILITY MANAGER

Current Job Title

1100 PIKE ST.

Current Work Address

HUNTINGDON, P.A. 16654

City, County, State, Zip Code

Defendant 5:

HICKS

Name (Last, First)

EMPLOYMENT DEPT

Current Job Title

1100 PIKE ST.

Current Work Address

HUNTINGDON, P.A 16654

City, County, State, Zip Code

Defendant 6

EASTERN UNIVERSITY

Name (Last, First)

(PEP) PRISON Education Program Director

Current Job Title

1300 EAGLE ROAD

Current Work Address

SAINT DAVIDS, P.A. 19087

City, County, State, Zip Code

Defendant 7

UNIVERSITY OF SCRANTON

Name (Last, First)

(PEP) PRISON Education Program Director

Current Job Title

800 LINDEN STREET

Current Work Address

SCRANTON P.A. 18510

City, County, State, Zip Code

Defendant 8

VILLANOVA UNIVERSITY

Name (Last, First)

(PEP) PRISON Education Program Director

Current Job Title

800 E LANCASTER AVENUE

Current Work Address

VILLANOVA P.A. 19085

City, County, State, Zip Code

Defendant 9

LEHIGH CARBON COMMUNITY COLLEGE

Name (Last, First)

(PEP) PRISON Education Program Director

Current Job Title

4525 Education Park Drive

Current Work Address

SCHNECKSVILLE P.A. 18078

City, County, State, Zip Code

Defendant ~~10~~ 40

Bloomsburg University

Name (Last, First)

(PEP) Prison Education Program Director

Current Job Title

400 E 2nd St.

Current Work Address

Bloomsburg, P.A. 17815

City, County, State, Zip Code

Defendant ~~31~~

HOOPER

Name (Last, First)

Education Principle

Current Job Title

1100 Pike St.

Current Work Address

HUNTINGDON, P.A. 16654

City, County, State, Zip Code

Defendant ~~42~~

SAYLOR

Name (Last, First)

EDUCATION COUNSELOR

Current Job Title

1100 Pike St.

Current Work Address

HUNTINGDON, P.A. 16654

City, County, State, Zip Code

Defendant ~~53~~

STRONG - LT.

Name (Last, First)

SECURITY / FORMER PREA REPRESENTATIVE

Current Job Title

1100 Pike St.

Current Work Address

HUNTINGDON, P.A. 16654

City, County, State, Zip Code

### III. STATEMENT OF FACTS

State only the facts of your claim below. Include all the facts you consider important. Attach additional pages if needed.

A. Describe where and when the events giving rise to your claim(s) arose.

SCI-HUNTINGDON - 1100 Pike St., Huntingdon, P.A. 16654  
From 08-17-2022 up until today AS WE SPEAK

B. On what date did the events giving rise to your claim(s) occur? <sup>1- GRIEVANCE # 1058808</sup> GRIEVANCE wrote 12/1/23

There is not one specific date concerning policy 12/6/23  
& safety but it started on 08-17-2022 up until now 12/14/23  
08/19/2022 Assault to place 4/25/2024 was the latest.

10/19/23, 10/22/23 11/19/2023 11/22, 26, /23 12/3, 4, 5, 10, 11/23

C. What are the facts underlying your claim(s)? (For example: What happened to you?  
Who did what?)

Attached paperwork

included

(SEVEN) 7 PAGES



1- I AM FILING this Claim due to; <sup>①</sup> Hindering my Rehabilitation

② Institutional oppression ③ Campaign of Harrassment & discrimination  
④ Ethnic, Racial intimidation ⑤ Abuse of Power ⑥ Abuse of Discretion.

2- P.A.D.O.C.'s DR. LAUREL R. HARRY, hindered my Rehabilitation For Policies & Regulations that discriminate towards my Educational Needs wherein TITLE IX of the Education AMENDMENT of 1972, created a (20 U.S.C. § 1681) Private right of action for victims of Education discrimination. I AM BEING discriminated due to Policies that put restrictions on a inmate that comes into the P.A.D.O.C. system with a High-School general Equivalency diploma / H.S. diploma, by not having & offering an Accredited College degree Correspondence Paper-based courses from Accredited Colleges or Universities.

P.A.D.O.C.'s Dr. L.R. Harry, also did not abide by the Pertinent Acts of Congress, which in July 2023 passed a bill that inmates / prisoners can apply & receive Pell grants for a College degree program, which trickled down to SCI-Huntingdon's Education Dept.'s Principle Hoover & Counselor Saylor, who ~~lied~~ deny & restrict inmates from taking programs when the SCI's Education Dept. is federally funded, when I tried to get a state license in Barbering, being they

Huntingdon was getting a Kios, connected to PENNDot and when we complete the course we can take our permit test which was a lie.

P.A.D.O.C. is Cruel & PREJUDICE, by not separating Religion & State, when they offer Christian College Programs, but NO BUSINESS MANAGEMENT College Programs or ANY other courses.

Also, ME having/going through mental health is a Violation of (TITLE II of the ADA) Americans with Disabilities Act of 1990, 42 U.S.C.S. §§ 12131-12165, provides that NO individual with a disability be excluded from Participation in or be denied the benefits of the services, programs, or activities, And SCI-Huntingdon is doing that all around the board, Educationally & Religiously. ME, being denied in all Violates the Protection of the Rehabilitation Act of 1973, (Mental Health) 29 U.S.C.S. § 701

ON FEBRUARY 21, 2024, President Biden, had an interview on student debt Relief, and he said, "A COLLEGE DEGREE IS A TICKET TO A BETTER LIFE," I SAY THAT TO SAY; MY LIFE IS ALL ABOUT REHABILITATION AND EDUCATION IS THE ONLY WAY YOU CAN GAIN KNOWLEDGE IN ORDER TO HAVE A DIFFERENT OUTLOOK ON LIFE AND PENNSYLVANIA DEPARTMENT OF CORRECTIONS AGAIN IS DENYING ME THAT AS A INMATE.

3- CONGRESS, PASSED THE PELL GRANT BILL, JULY OF 2023, BUT DID NOT MAKE SURE PENNSYLVANIA, AND OTHER STATES DEPARTMENT OF CORRECTIONS IMPLEMENT IT RIGHT

POLICY / REGULATIONS P.A.D.O.C. USES SHOWS CONGRESS HAS VIOLATED THE EQUAL RIGHTS AMENDMENT IN THE PENNSYLVANIA & FEDERAL CONSTITUTION BECAUSE IT ONLY APPLIES TO UNEDUCATED, INMATES / PRISONERS -

4- ALL COLLEGES MENTIONED, ARE IN VIOLATION OF P.A.'S EQUAL RIGHTS AMENDMENT, BEING THEY ONLY OFFER A SELECT AMOUNT OF PEOPLE INTO THE COLLEGE PELL GRANT PROGRAM, WHICH IS A GOOD LOOK IN LIFE AND AT A STATE PAROLE BOARD HEARING, DUE TO NOT OFFERING PAPER-BASED COLLEGE DEGREE PROGRAMS LIKE; UPPER IOWA UNIVERSITY, BUT P.A.D.O.C. REFUSES TO ALLOW PEP COLLEGES FROM OTHER STATES.

4- MAINLY, P.A.D.O.C is in Violation of the CIVIL RIGHTS RESTORATION Act of 1987, 20 U.S.C. § 1687, because Education must be Fully operative when Entity (P.A.D.O.C.) RECEIVES FEDERAL FINANCIAL ASSISTANCE, which it is not, being SCI-Huntingdon DOES NOT have a COLLEGE program.

\* SEE CASE; 799 F.Supp. 513, And because of that I also feel attacked by being Institutional oppressed by J. Rivello, who also let a Lt. J. Corley assault me so I WAS UNPROTECTED AS AN INMATE. \* SEE CASE; 1:22-CV-01337, because I FEEL UNSAFE AND I FEAR for my life AND WENT Court to FORCE P.A.D.O.C. to transfer me out of this Facility, because Judge Rambo, WON'T.

5- Facility Conditions; EXSS~~ESSIVE~~IVE power outages puts me at danger of being attacked by other inmates A SCI-Huntingdon ran under J. Rivello

Facility has UNCONDITIONAL plumbing, toilets only Flush 2 time per Hour AND BEING CELLED with Another inmate is CRUEL & UNUSUAL punishment BEING I HAVE to <sup>INHALE &</sup> SMELL his shit (do-do).

Also ASBESTOS in Jail, being I'm a CERTIFIED plumber AND worked with the plumbing Department at SCI-Huntingdon.

6- P.A.D.O.C. & Ms Hicks of SCF-Huntingdon, USE AN UNCONSTITUTIONAL pay scale, which puts 1 inmate over the other, shows favoritism towards inmates <sup>used by</sup> and staff, because they do not stand by policy which states; 3 pay classes - unskilled, semi-skilled and skilled, and I'm certified from BERK TRADE & BUSINESS SCHOOL IN PLUMBING <sup>so I am skilled</sup> AND I got paid as a unskilled employee and I'd like all back pay as a skilled worker, which I grieved due to that case. I was told Policy 816 is being updated pending approval, so percentages will be removed cause they can not pay every one top pay, which every worker should be afforded the right to achieve.

7- Eastern University, University of Scranton, Villanova University, Lehigh Carbon Community College, Bloomsburg University, are in violation of the Constitution Amendments by putting prohibitions against exclusion from participating in, denial of benefits of, and discrimination under federally assisted programs on ground of race, color or national origin, being they do not offer all jail facilities an opportunity to attend college using a Pell grant.

BROWN V. BOARD OF EDUCATION, (EVERYONE has to be afforded education)

8.- J. Rivello & Lt. Strong, ignored and covered up LT. J. Corley assaulting Plaintiff, JAMIEL L WILLIAMS ON 8-19-2022, Rivello, refused to transfer plaintiff when plaintiff fears for his life when he SEE'S LT. J. Corley AND LT. Strong WAS PREA Coordinator but got transferred to Security, but when she WAS told AS A PREA representative she ignored it AND told ME A story of her going to a bar IN philadelphia with her girlfriends AND they WAS drinking, but A MAN ~~KEP~~ hitting on her SAYING I turned him down, when he WANTED to bring her home for SEX, CAUSE she is BEAUTIFUL, but you CAN'T compare that act to A PREA SEXUAL ASSAULT. Rivello, told ME, forget what happened or I'll put you IN the RHU for the remainder of your time AND JUST BE NICE to other officers ME / THEY put my safety at risk.

9. Ms Saylor & Ms Hoover, GAVE ME A MEMO, stating I will BE ABLE to TAKE my CDL permit, AFTER completion of CDL CLASS, CAUSE FROM PENNDOT they / The Facility WAS getting A KIOS, that WAS connected to PENNDOT AND those who TAKE the CLASS CAN TAKE the Permit test AFTERWARDS AND they LIE to get ME to TAKE the CLASS AND REFUSE to put ME IN the STATE LICENSED Barber program that CAN help with my rehabilitation that they ARE hindering.



10 P.A.D.O.C., J. RIVELLO, REFUSES to let me Vote & File TAXES for the work I do in the plumbing Department, which is a Violation of Amendment 15 section 1 AND Amendment 16, for the INCOME I make working in P.A.D.O.C, which I get TAXED ON When I buy Commissary <sup>from the Facility</sup> to LIVE off of. Which CAN BE billions provided to the U.S. GOVERNMENT.

11- P.A.D.O.C. FACILITIES COUNT EACH INMATE AS A CITIZEN of that County for CENSUS yearly for federal funds, so they also violate AMENDMENT 19.

12- P.A.D.O.C.'S DOES NOT put people in Required Programming <sup>RIGHT AWAY</sup> which takes away from opportunities to Educate yourself on a College level or work AND BECAUSE its last minute, when you go to a Parole hearing AND you don't have it done, they deny you release from Jail AND its D.O.C.'S FAULT, Not MINEs, A INMATE.

13- ALSO- HARRASSED by Ms. Hoover, over Policy for Pell GRANTS to Do A College Program.

14- P.A.D.O.C., For NOT UPDATING AND ADVANCING in today's times by NOT Having computer rooms or ACCESS to computer USAGE & upgraded technology ( P. 7 )

## IV. LEGAL CLAIM(S)

You are not required to make legal argument or cite any cases or statutes. However, state what constitutional rights, statutes, or laws you believe were violated by the above actions. If you intend to assert multiple claims, number and set forth each claim in separate paragraphs. Attach additional pages if needed.

AMENDMENT # 1, 5, 8, 14, 15, 16, 19

<sup>2</sup> prohibiting the free exercise thereof; or abridging the freedom of speech; <sup>5</sup> Nor be deprived of life, liberty or property; <sup>8</sup> Nor cruel & unusual punishment inflicted <sup>14</sup> No state shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States, Nor shall any state deprive any person of life, liberty or property, Nor deny to any person within its jurisdiction the equal protection of the laws

deliberate indifference, callous indifference

## V. INJURY

\* PANIC Attacks, sleeping disorder & PARANOIA FEAR FOR SAFETY  
Describe with specificity what injury, harm, or damages you suffered because of the events described above. MENTALLY STRESSED led to WEIGHT LOSS - MENTAL & EMOTIONALLY INJURIES

deprived of a BASIC HUMAN NEED, deprived of Rehabilitative program

that can help in life & at a Parole board hearing, <sup>inhaling</sup> Sanitation toilets, prison officials

THREATEN to kill me on May 1, 2024; mental distressed from retaliation

CAUSE OF LAWSUIT AGAINST STAFF VI. RELIEF Failure to protect. Mental anguish, Torture of Mind.

Extraordinarily prejudicial. Loss of earnings, irreparable harm

State exactly what you want the court to do for you. For example, you may be seeking money damages, you may want the court to order a defendant to do something or stop doing something, or you may be seeking both types of relief. If you are seeking monetary relief, state your request generally. Do not request a specific amount of money. internet access i

CHANGE OF Policy, NOMINAL & PUNITIVE DAMAGES IN THE AMOUNT OF \$5,000,000<sup>xxx</sup>, COMPENSATORY DAMAGES OF \$5,000,000<sup>xxx</sup>, AN preliminary & INJUNCTION relief ording PA.DOC, SCI-HUNTINGDON to change policy on Pay, Tax & Voting. SEEKS COST recovered of Filing this suit.

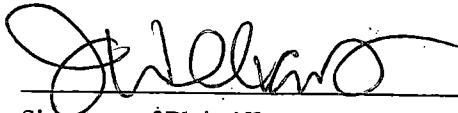
ANY additional relief this court <sup>Page 5 of 6</sup> deems just, proper and equitable. Plaintiff also seeks Jury trial on all issues triable by Jury



**VII. SIGNATURE**

By signing this complaint, you represent to the court that the facts alleged are true to the best of your knowledge and are supported by evidence, that those facts show a violation of law, and that you are not filing this complaint to harass another person or for any other improper purpose.

Local Rule of Court 83.18 requires *pro se* plaintiffs to keep the court informed of their current address. If your address changes while your lawsuit is being litigated, you must immediately inform the court of the change in writing. By signing and submitting the complaint form, you agree to provide the Clerk's Office with any changes to your address where case-related papers may be served, and you acknowledge that your failure to keep a current address on file with the Clerk's Office may result in dismissal of your case.



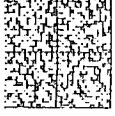
Signature of Plaintiff

5-10-2024

Date

INMATE MAIL  
PA DEPARTMENT  
OF CORRECTIONS

US POSTAGE



ZP 10-52 \$003.79<sup>0</sup>

SMART COMM / P.A. DOC  
JAMIEL L. WILLIAMS  
#QJ0995  
SCI- HUNTINGDON  
P.O. BOX 33028  
St. Petersburg, FL 33733

RECEIVED  
SCRANTON

MAY 20 2024

PER SP DEPUTY CLERK

UNITED STATES District Court  
Middle district of PENNSYLVANIA  
Attn: Clerk of Court  
235 N. Washington Ave.  
P.O. BOX 1148  
SCRANTON, P.A. 18501

